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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

HILAL K. HOMAIDAN fka Helal K. Homaidan  
  
Debtor,

Chapter 7

Case No. 08-48275 (ESS)

In re:

REEHAM YOUSSEF aka Reeham Navarro Youssef aka  
Reeham N. Youssef  
  
Debtor,

Chapter 7

Case No. 13-46495 (ESS)

HILAL K. HOMAIDAN and REEHAM YOUSSEF on  
behalf of themselves and all others similarly situated

Plaintiffs,

Adv. Pro. No. 17-1085

v.

SALLIE MAE, INC, NAVIENT SOLUTIONS, LLC,  
NAVIENT CREDIT FINANCE CORPORATION

Defendants.

**DECLARATION OF REEHAM YOUSSEF**

Reeham Youssef being duly sworn deposes and says:

1. I am a Plaintiff in the above-entitled proceeding and I make this declaration in support of Plaintiffs' motion for class certification, summary judgment and a preliminary injunction.

2. From 2005 to 2008, I was a student at Queens College of the City of New York.

3. The cost of attendance for an in-state student living off campus at Queens College was \$16,816 for the academic year of 2005 to 2006; \$17,293 for the academic year of 2006 to 2007; and \$17,725 for the academic year of 2007 to 2008.

4. During the 2005 to 2006 academic year, I received a school certified loan of \$4,800.

5. During the 2006 to 2007 academic year, I received a school certified loan of \$6,000 and four (4) Tuition Answer Loans from Sallie Mae totaling \$31,850. *See* Exhibit A through Exhibit D attached hereto.

6. During the 2007 to 2008 academic year, I received two (2) Tuition Answer Loans totaling \$24,150. *See* Exhibit E and F attached hereto.

7. All or most of the Tuition Answer Loans that I received exceeded the cost of attendance.

8. On October 29, 2013, I sought relief under Title 11 in this Court in Case No. 1-13-46495 (ESS) (*In re Reeham Youssef*). Dkt. No. 1.

9. I properly scheduled the Tuition Answer Loans on the Schedule F of my petition. *See* Dkt. No. 1.

10. On February 6, 2014, this Court entered an order discharging all of my properly scheduled pre-petition debts. Dkt. No. 9.

11. On February 6, 2014, Defendants were duly notified of the discharge of my pre-petition debts. Dkt. No. 10.

12. Nonetheless, Navient sent me letters on or about August 30, 2016 advising me that my Tuition Answer Loans were not discharged in bankruptcy. *See* Exhibits G to L attached hereto.

13. Instead of treating my Tuition Answer Loans as discharged, Defendants have demanded repayment from me on said loans and resumed collection on said loans after the debts were discharged. In particular, Defendants and the debt collection agency they retained constantly called me, my parents, my sister and several of my friends, demanding payment on my Tuition Answer Loans. Defendants also continued to send me statements indicating that my loans were past due. *See e.g.*, Exhibits N to Q

14. Ultimately, in 2017 and again in 2018, I took out loans from a credit union to settle the debts owed on some of my Tuition Answer Loans, although Defendants claim that I still owe thousands of dollars on my remaining Tuition Answer Loans.

15. On October 1, 2019, I moved to re-open my bankruptcy proceeding (Dkt. No. 11) and to amend the complaint in the above-entitled adversary proceeding. Adv. Pro. Dkt. No. 156.

16. The Court granted the motion to re-open and to amend the complaint herein from the bench on October 16, 2019. *See* Tr. of October 16, 2019, Hearing at 11-12, attached hereto as Exhibit R, and an order was entered granting the motion to re-open on December 4, 2019. *See* Exhibit S, hereto.

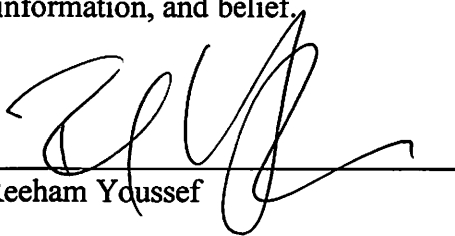
17. An amended complaint was filed on Oct. 21, 2019. Adv. Pro. Dkt No. 160.

18. I understand that, if this Court certifies this proceeding as a Class Action, I may be named as a class representative. In that capacity, I am prepared to consult on a regular basis with counsel, to keep apprised of major developments in the proceeding, and to participate in

discussions with counsel with regard to any major decisions. I have already been deposed in this proceeding and am prepared to take on any other responsibilities necessary to insure that this proceeding advances expeditiously. I have not been promised any remuneration for acting as a class representative in this proceeding.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 9, 2019

  
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Reeham Youssef